



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

January 2, 2013

JOHN BOTTS
NARAL PRO-CHOICE AMERICA
1156 15TH STREET NW
WASHINGTON, DC 20005

Response Due Date
02/06/2013

IDENTIFICATION NUMBER: C90004185

REFERENCE: JULY QUARTERLY REPORT (04/01/2012 - 06/30/2012)

Dear Filer:

This letter is prompted by the Commission's preliminary review of the Report of Independent Expenditures Made and Contributions Received (FEC Form 5) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Commission by the response date noted above.** Additional information is needed for the following 4 item(s):

1. It appears that 48-hour notice(s) for the attached independent expenditures was filed late. Please be advised that you are required to file 48-hour reports once you make independent expenditures aggregating \$10,000 or more with respect to a given election any time during the calendar year up to and including the 20th day before the election. The report must be received at the Commission 11:59 p.m. Eastern Standard/Daylight Time by the second day after the communication was publicly distributed or otherwise disseminated. In the report, you must include information for all independent expenditures that have not been previously reported. Each time you make subsequent independent expenditures relating to the same election that aggregate \$10,000 or more, you must file another 48-hour report disclosing these independent expenditures. (11 CFR § 109.10(c) and (e)) Please provide clarification regarding the timeliness of your 48-hour reporting for the independent expenditures in question. Further, if the date disclosed on your Form 5 was the date of payment, rather than the date of public dissemination or distribution, please provide the date of dissemination or distribution.

In addition, please be advised that you are required to disclose these independent expenditures, along with contribution and disbursement information, on Form 5 as a regularly scheduled quarterly report. (11 CFR § 109.10(b) and (e))

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2. Your 48-hour reports, filed on 4/12/12, 4/13/12, 4/19/12, 4/24/12, 5/15/12, 5/22/12, 5/30/12, 6/20/12, and 6/26/12, disclosed independent expenditures that do not appear on Schedule 5-E of your quarterly filing (see attached). Please amend your report to include these expenditures or provide an explanation of this apparent discrepancy. (11 CFR § 109.10(b))

3. Your quarterly report discloses independent expenditures that do not appear on 48-hour reports (see attached).

Please be advised that Commission regulations require that you file 48-hour reports once you make independent expenditures aggregating \$10,000 or more with respect to a given election during the calendar year up to and including the 20th day before the election. The report must be received at the Commission 11:59 p.m. Eastern Standard/Daylight Time by the second day after the communication was publicly distributed or otherwise disseminated. In the report, you must include information for all independent expenditures that have not been previously reported. Each time you make subsequent independent expenditures relating to the same election that aggregate \$10,000 or more, you must file another 48-hour report disclosing these independent expenditures. (11 CFR § 109.10(c) and (e))

In addition, you are required to file 24-hour reports once your independent expenditures aggregate \$1,000 or more after the 20th day but more than 24 hours before 12:01 a.m. of the day of the election. The report must be received at the Commission by 11:59 p.m. Eastern Standard/Daylight Time of the day following the date on which the communication was publicly distributed or otherwise disseminated. In the report, you must include information for all independent expenditures that have not been previously reported. Each time you make subsequent independent expenditures relating to the same election that aggregate \$1,000 or more, you must file another 24-hour report disclosing these independent expenditures. (11 CFR § 109.10(d) and (e))

Please provide clarification regarding whether 24/48-hour reports were required but not filed. If the date disclosed on your Form 5 was the date of payment, rather than the date of public dissemination or distribution, please provide the date of dissemination or distribution.

4. Line 7 of your FEC Form 5 filing discloses disbursements made for independent expenditure(s). However, no contributions are disclosed on Line 6, "Total Contributions." Each contributor who made a donation in excess of \$200 used to fund the independent expenditure(s) must be itemized on Schedule 5-A, including their identification information. Please amend your

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report to provide the missing information. (11 CFR §§ 109.10(e)(1)(vi) and 114.10(f))

Please note, you will not receive an additional notice from the Commission on this matter. Requests for extensions of time in which to respond will not be considered. Failure to comply with the provisions of the Act may result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1395.

Sincerely,

A handwritten signature in black ink that reads "Benjamin G. Holly". The signature is written in a cursive, flowing style.

Ben Holly
Senior Campaign Finance Analyst
Reports Analysis Division

Late Filed 48-Hour Notices
NARAL Pro-Choice America (C90004185)

Name	Date	Amount	Purpose	Candidate
Chapman Cubine Adams & Hussey	6/5/12	\$500.00	Telemarketing management	Barack Obama
Chapman Cubine Adams & Hussey	6/5/12	\$500.00	Telemarketing management	Mitt Romney

Missing Schedule E**NARAL Pro-Choice America (C90004185)**

Name	Date	Amount	Purpose	Candidate
NARAL Pro-Choice Foundation	4/12/12	\$3,539.93	List rental	Mitt Romney
NARAL Pro-Choice Foundation	4/12/12	\$3,539.94	List rental	Barack Obama
NARAL Pro-Choice Foundation	4/13/12	\$3,539.93	List rental	Barack Obama
NARAL Pro-Choice Foundation	4/13/12	\$3,539.93	List rental	Mitt Romney
Google	4/17/12	\$190.00	Online advertising	Mitt Romney
NARAL Pro-Choice Foundation	4/19/12	\$3,539.94	List rental	Barack Obama
NARAL Pro-Choice Foundation	4/19/12	\$3,539.94	List rental	Mitt Romney
Google	4/24/12	\$190.00	Online advertising	Mitt Romney
NARAL Pro-Choice Foundation	4/24/12	\$7,433.00	List rental	Mitt Romney
Google	5/2/12	\$190.00	Online advertising	Mitt Romney
Google	5/8/12	\$190.00	Online advertising	Mitt Romney
Google	5/15/12	\$190.00	Online advertising	Mitt Romney
Facebook	5/15/12	\$1,000.00	Online advertising	Barack Obama
Facebook	5/15/12	\$1,000.00	Online advertising	Mitt Romney
Google	5/15/12	\$2,500.00	Online advertising	Barack Obama
Google	5/15/12	\$2,500.00	Online advertising	Mitt Romney
NARAL Pro-Choice Foundation	5/15/12	\$3,539.94	List rental	Barack Obama
NARAL Pro-Choice Foundation	5/15/12	\$3,539.94	List rental	Mitt Romney
Google	5/22/12	\$190.00	Online ads	Mitt Romney
Pacific East	5/22/12	\$331.00	Data processing	Barack Obama
Pacific East	5/22/12	\$331.00	Data processing	Mitt Romney
Public Interest Communications	5/22/12	\$11,117.50	Telemarketing	Barack Obama
Public Interest Communications	5/22/12	\$11,117.50	Telemarketing	Mitt Romney
Harris Direct	5/22/12	\$11,937.50	Telemarketing	Barack Obama
Harris Direct	5/22/12	\$11,937.50	Telemarketing	Mitt Romney
Google	5/29/12	\$190.00	Online advertising	Mitt Romney
NARAL Pro-Choice Foundation	5/30/12	\$3,716.50	List rental	Barack Obama
NARAL Pro-Choice Foundation	5/30/12	\$3,716.50	List rental	Mitt Romney
Google	6/5/12	\$190.00	Online ads	Mitt Romney
Share Group	6/5/12	\$490.07	Telemarketing	Barack Obama
Share Group	6/5/12	\$490.07	Telemarketing	Mitt Romney
Pacific East	6/6/12	\$75.00	Data processing	Barack Obama
Pacific East	6/6/12	\$75.00	Data processing	Mitt Romney

Missing Schedule E
NARAL Pro-Choice America (C90004185)

Name	Date	Amount	Purpose	Candidate
Google	6/12/12	\$190.00	Online ads	Mitt Romney
Google	6/21/12	\$190.00	Online ads	Mitt Romney
Google	6/26/12	\$190.00	Online ads	Mitt Romney
NARAL Pro-Choice Foundation	6/26/12	\$7,433.00	List rental	Barack Obama

Missing 48-Hour Notices**NARAL Pro-Choice America (C90004185)**

Name	Date	Amount	Purpose	Candidate
Chapman Cubine Adams & Hussey	4/12/12	\$421.87	Copywirting & Art	Barack Obama
NARAL Pro-Choice Foundation	4/12/12	\$3,660.50	List rental	Barack Obama
NARAL Pro-Choice Foundation	4/12/12	\$3,660.50	List rental	Mitt Romney
NARAL Pro-Choice Foundation	4/13/12	\$3,667.50	List rental	Barack Obama
NARAL Pro-Choice Foundation	4/13/12	\$3,667.50	List rental	Mitt Romney
Google	4/17/12	\$188.12	Online advertising	Mitt Romney
NARAL Pro-Choice Foundation	4/19/12	\$3,663.56	List rental	Mitt Romney
NARAL Pro-Choice Foundation	4/19/12	\$3,663.57	List rental	Barack Obama
Google	4/24/12	\$187.09	Online advertising	Mitt Romney
NARAL Pro-Choice Foundation	4/24/12	\$15,793.13	List rental	Mitt Romney
Google	5/2/12	\$174.89	Online advertising	Mitt Romney
Google	5/8/12	\$171.69	Online advertising	Mitt Romney
Google	5/15/12	\$165.91	Online advertising	Mitt Romney
Chapman Cubine Adams & Hussey	5/15/12	\$291.66	Copy, art & production	Barack Obama
Chapman Cubine Adams & Hussey	5/15/12	\$291.67	Copy, art & production	Mitt Romney
Chapman Cubine Adams & Hussey	5/15/12	\$450.00	Copy, art & production	Barack Obama
Chapman Cubine Adams & Hussey	5/15/12	\$450.00	Copy, art & production	Mitt Romney
Google	5/15/12	\$1,107.30	Online advertising	Barack Obama
Google	5/15/12	\$1,107.30	Online advertising	Mitt Romney
Google	5/15/12	\$2,122.61	Online advertising	Mitt Romney
Google	5/15/12	\$2,122.62	Online advertising	Barack Obama
NARAL Pro-Choice Foundation	5/15/12	\$3,695.25	List rental	Barack Obama
NARAL Pro-Choice Foundation	5/15/12	\$3,695.25	List rental	Mitt Romney
Google	5/22/12	\$113.72	Online ads	Mitt Romney
Pacific East	5/22/12	\$141.00	Data processing	Barack Obama
Pacific East	5/22/12	\$141.00	Data processing	Mitt Romney
Harris Direct	5/22/12	\$12,345.50	Telemarketing	Barack Obama
Harris Direct	5/22/12	\$12,345.50	Telemarking	Mitt Romney
Public Interest Communications	5/22/12	\$13,983.00	Telemarketing	Barack Obama
Public Interest Communications	5/22/12	\$13,983.00	Telemarketing	Mitt Romney
Google	5/29/12	\$168.92	Online advertising	Mitt Romney
NARAL Pro-Choice Foundation	5/30/12	\$3,686.62	List rental	Barack Obama
NARAL Pro-Choice Foundation	5/30/12	\$3,686.63	List rental	Mitt Romney

Name	Date	Amount	Purpose	Candidate
Google	6/5/12	\$184.62	Online ads	Mitt Romney
Pacific East	6/6/12	\$37.50	Data processing	Barack Obama
Pacific East	6/6/12	\$37.50	Data processing	Mitt Romney
Google	6/12/12	\$182.95	Online ads	Mitt Romney
Google	6/21/12	\$184.63	Online ads	Mitt Romney
Google	6/26/12	\$185.70	Online ads	Mitt Romney
NARAL Pro-Choice Foundation	6/26/12	\$7,540.88	List rental	Barack Obama